

REMARKS

Claims 1-15 remain pending in this application.

Claims 1, 2, 7 and 11 are presently amended to clarify the claimed subject matter so as to remove the previously claimed "if" statements. Claim 15 is new.

The subject matter of this amendment and of new claim 15 is fully supported by the specification, and can be found in at least paragraphs [027] to [028] and [046] to [053] of the description. No new matter is added by the present amendment.

Claim Rejections – 35 USC § 102

Claims 1-3, 5-14 are rejected under 35 U.S.C. 102(e) as being anticipated by Zollinger et al. (US Patent No. 6,321,236).

In response, and concerning claim 1, the applicant clarifies the claimed subject matter such that the previous "if" statements are removed.

In addition, the Applicant submits the following arguments:

Zollinger et al. does not teach "matching said data version received from said client computer with said data version associated with said data element from said main list on said shared storage medium, said matching comprising one of: (...)", as claimed in claim 1.

The Office Action refers to Fig. 6, steps 106 and 110 in Zollinger et al. as teaching at least one of the previous "if" statements of previous claim 1. In response, the Applicant respectfully points out that Zollinger et al. discloses a method for updating databases, or a database management system. In col. 13, for example, which describes steps 106 and 110, there is disclosed:

"the server synchronizer component 46 will compare the version number of the client copy of the database table with the most current number of the original database table on the server. If the client version is less than the server version, all of the sequentially numbered intervening updates will be applied" (col. 13: lines 1-5).

Hence, Zollinger et al. treats of **database tables**, not of data elements stored in a plurality of client computers, and **applies intervening updates** from intervening version numbers of database tables to update the data in the database tables. In Zollinger et al.'s method, the actual

data in the database along with how it was treated or processed has to be known in order to apply the intervening updates.

Furthermore, at lines 19-25, Zollinger et al. discloses that:

"before transmitting instructions to a particular client, the server synchronizer component 46 must interact with the translator component 60 in order to translate either the **differences taken from the updates or the entire database table** itself into a format or **instructions** understood by the **type of database engine running on the client**" (emphasis added). Also, at lines 29-33, it is disclosed that "at step 110, for each database table at the client, the **instructions** (as referred above at lines 19-25) and current version number of the database table are transmitted to the client so that the client may make the client copy of the database table current" (emphasis added).

From the above passage, it is clear that instructions in Zollinger et al. are used by the client computer to process the database table on the client computer to make the client copy of the database table current. In other words, as further stated in col. 13, lines 54-56:

"these instructions will be of the appropriate format for the native database engine type found on the client." And "at step 118, the client will **operate the database engine and the instructions** received previously at step 116, to **apply the difference updates**" (col. 13, lines 58-60) (emphasis added).

It is therefore clear from the above statements in Zollinger et al. that in order for the tables on the client computer to be made current, the client computer has to treat or process the locally stored data in order to make it current. The data versions are not matched but made current once the locally stored **data is treated** according to the instructions.

The Applicant therefore submits that the method disclosed by Zollinger et al. does not suggest "matching said data version received from said client computer with said data version associated with said data element from said main list on said shared storage medium, said matching comprising one of: (...)", as claimed in claim 1.

In view of the above, the Applicant therefore respectfully submits that amended claim 1 overcomes the above rejection under 35 USC § 102. Reconsideration is kindly requested.

Further in view of the arguments provided hereinabove concerning claim 1, claims 7 and 11, which recite a similar limitation, are deemed to overcome the above rejection.

Similar arguments apply for dependent claims 2-6, 8-10 and 12-14. These claims are thus also deemed to overcome the above rejection.

In view of the foregoing, reconsideration of the rejection of Claims 1-14 is respectfully requested. It is believed that Claims 1-14 overcome the rejections and a Notice of Allowance for claims 1-15 is earnestly solicited.

Respectfully submitted,

Iain B. FINDLETON et al.

By: /C. MARC BENOÎT/
C. Marc BENOÎT (Reg. N° 50,200)
Customer No. 020988